

United States Senate

WASHINGTON, DC 20510

September 11, 2018

The Honorable Betsy DeVos
Secretary of Education
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Dear Secretary DeVos:

We write today regarding the U.S. Department of Education's ongoing institution-based experiment to provide access to Pell Grants for eligible students participating in dual enrollment programs. Specifically, we write to request the Department consider accepting another round of applications for additional institutions to join the experiment, and to relay feedback we have received on the experiment's current construction and offer recommendations as to how it might be modified for an additional round of applications to have an even greater impact for low-income students and the institutions that serve them. Thank you for your attention to this important matter.

Under the Department's dual enrollment experimental site, 43 diverse programs nationwide run by approved Institutions of Higher Education have been selected to allow up to 10,000 low-income high school students to access their Pell grants in order to participate. Access to federal financial aid under the experiment is designed to offset the costs of tuition, fees, and books for dual enrollment programs that provide students with the opportunity to earn a minimum of twelve college credits on a pathway towards a degree or credential as well the support services necessary to ensure their success. We request that the Department assess whether the currently participating institutions are likely to meet the Department's goal of 10,000 participating students; and consider accepting another round of applications for additional institutions to join the experiment beginning with the next school year.

We would also encourage the Department to consider making changes to the experiment for any new institutions admitted, responsive to feedback from the initial set of institutions selected to participate in the experiment. The experiment presently requires that, "Participating institutions...ensure that after all Federal Pell Grants, State, local, institutional aid, or other resources have been applied to student charges, students are not responsible for any remaining institutional charges as a result of enrolling in the postsecondary program as part of the institution's dual enrollment arrangement under the experiment." While we appreciate the presumed intent of this requirement to ensure access and affordability, it has come to our attention that this stipulation has had the unintended consequence of impeding or imperiling some students' ability to participate in the experiment altogether.

It is our understanding that at least one institution has already withdrawn from the experiment because they were unaware of the sizeable financial obligation and unable to fulfill it. Another institution would have followed suit were it not for extraordinary measures taken by the state's higher education coordinating body and community college system to identify and allocate the necessary funds. At a minimum, we would encourage the Department to make this fiduciary requirement clearer in future iterations of the experiment and provide participating schools—many of them community colleges or minority-serving institutions—with guidance on identifying funding sources. We would also urge you to consider making additional federal funding available to participating schools or allowing students to contribute some modest amount towards their postsecondary courses to help institutions offset costs.

Further, the experiment requires that participating schools demonstrate that, "Federal Pell Grants made available to students to enroll in participating institutions through this experiment must not supplant public and institutional sources of funding for an institution's dual enrollment arrangement(s)." While we share the Department's desire to see expanded access to dual enrollment programs for low- and moderate-income students, this requirement, too, has had unintended consequences in its implementation. One school district that would have otherwise been qualified and eager to participate in the experiment was deemed ineligible to apply because they already finance their Pell-eligible students' costs. Were the experiment's supplement-not-supplant language crafted differently, this school district would have been able to reach even more students—expanding dual enrollment access across the board, while still providing access for their Pell-eligible population. While we share the experiment's objective to encourage *additional* investment in dual enrollment access, we would encourage you to consider and adopt a more tailored supplement-not-supplement requirement that gives schools slightly more latitude in determining how to allocate funds amongst dual enrollment participants.

Thank you for your continued commitment to the Department's Pell dual enrollment experimental site, and for your consideration of these recommendations. Please do not hesitate to have your staff contact Lauren Marshall at (202) 527-0431 or Lauren_Marshall@warner.senate.gov or Megan Harrington at (202) 224-3353 or Megan_Harrington@portman.senate.gov with any questions. We look forward to continuing to work with you on this promising initiative.

Sincerely,



Mark R. Warner
United States Senator



Rob Portman
United States Senator